

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC., PELVIC
REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**THIS DOCUMENT RELATES TO
THE CASES ON THE EXHIBITS
ATTACHED HERETO**

**Master File No. 2:12-MD-02327
MDL No. 2327**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibits A - K, and Defendants, Johnson & Johnson, Ethicon, Inc. and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss without prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41(a)(2). No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ William J. Doyle, II

William J. Doyle, II
Doyle Lowther
4400 NE 77th Avenue
Vancouver, WA 98862
(360) 818-9320
bill@doylelowther.com

/s/ Matthew R. McCarley

Matthew R. McCarley
Fears Nachawati
5473 Blair Road
Dallas, TX 75231
(214) 890-0711
mccarley@fnlawfirm.com

/s/ William M. Gage

William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)

/s/ Jacob A. Flint

Jacob A. Flint
Flint Law Firm
P.O. Box 930
Glen Carbon, IL 62034
(618) 205-2017
jflint@flintlaw.com

P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com
Counsel for the Ethicon Defendants

/s/ Gregory F. Coleman

Gregory F. Coleman
Greg Coleman Law
550 West Main
Suite 600
Knoxville, TN 37902
(865) 247-0080
greg@gregcolemanlaw.com

/s/ Sean Michael Cleary

Sean Michael Cleary
Law Offices of Sean M. Cleary
19 West Flagler Street
Suite 618
Miami, FL 33130
(305) 416-9805
sean@clearypa.com

/s/ Elizabeth A. Peterson

Elizabeth A. Peterson
Lockridge Grindal Nauen
100 Washington Avenue South
Suite 2200
Minneapolis, MN 55401
(612) 339-6900
eapeterson@locklaw.com

/s/ Dennis A. Costigan

Dennis A. Costigan
Motley Rice
55 Cedar Street
Suite 100
Providence, RI 02903
(401) 457-7700
dcostigan@motleyrice.com

/s/ Alyson Oliver

Alyson Oliver
Oliver Law Group
950 West University Drive
Suite 200
Rochester, MI 48307
(248) 327-6556
aoliver@oliverlg.com

/s/ Amy Collignon Gunn

Amy Collignon Gunn
The Simon Law Firm
800 Market Street
Suite 1700
St. Louis, MO 63101
(314) 241-2929
agunn@simonlawpc.com

/s/ Marilyn T. McGoldrick

Marilyn T. McGoldrick
Thornton Law Firm
100 Summer Street
30th Floor
Boston, MA 02110
(617) 720-1333
mmcgoldrick@tenlaw.com

/s/ Erin M. Wood

Erin M. Wood
Leslie C. MacLean
Waters & Kraus
3141 Hood Street
Suite 700
Dallas, TX 75219
(214) 357-6244
ewood@waterskraus.com
lmaclean@waterskraus.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A
(Doyle Lowther)

<u>Civil Action No.</u>	<u>Case Style</u>
2:12-cv-04790	Sarah Reeves v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-26868	Lanell Munsee and Blain Munsee v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT B
(Fears Nachawati)

<u>Civil Action No.</u>	<u>Case Style</u>
2:14-cv-09986	Julie A. Parsons v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT C
(Flint Law Firm)

<u>Civil Action No.</u>	<u>Case Style</u>
2:13-cv-27618	Melissa Roberts v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-02833	Rebecca Payne v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-06293	Linda Bryce and William J. Bryce v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-08070	Rose Marie Bushway and Charles Bushway v. Ethicon, Inc.; Johnson & Johnson
2:18-cv-00894	Doris Ullendorff and Ken Gorfinkle v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT D
(Greg Coleman Law)

<u>Civil Action No.</u>	<u>Case Style</u>
2:18-cv-00584	Geraldine Bunt v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT E
(Law Offices of Sean M. Cleary)

<u>Civil Action No.</u>	<u>Case Style</u>
2:13-cv-13188	Maria Anaya v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson

EXHIBIT F
(Lockridge Grindal Nauen)

<u>Civil Action No.</u>	<u>Case Style</u>
2:14-cv-29016	Victoria Slaikeu and Kevin Slaikeu v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT G
(Motley Rice)

<u>Civil Action No.</u>	<u>Case Style</u>
2:13-cv-09239	Cynthia Donall and David Donall v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-00839	Phyllis S. Simmons v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:17-cv-00707	Deborah Dockery and Trey Dockery v. Ethicon, Inc.; Johnson & Johnson
2:17-cv-02854	Herminia Ornelas v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT H
(Oliver Law Group)

<u>Civil Action No.</u>	<u>Case Style</u>
2:12-cv-03180	Sherrill West v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT I
(The Simon Law Firm)

Civil Action No.	Case Style
2:12-cv-08575	Janet Drake and Kyle Drake v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-01325	Josephine Cross, as Personal Representative of the Estate of Marie Daugherty, deceased v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-03083	Kelly J. Webb v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-03084	Jennifer L. Jude v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-12013	Aimee Slusser v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-12057	Evelyn Barrera and Valdemar Barrera v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-14009	Doris Alford v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-15143	Charlotte Rondot v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-16595	Kimberly Schmitz and Kevin Schmitz v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-20904	Sherri Hughes and Donald Hughes v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-20911	Andrea Bettis and Robert Bettis v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-21986	Nettie Schultz and Gordon Schultz v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:15-cv-01630	Alicia Malcolm v. Ethicon, Inc.; Johnson & Johnson
2:15-cv-15404	Betty Banda v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-00236	Patricia Gilstrap v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-00238	Sherry Kirby and Clifford S. Kirby v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT J
(Thornton Law Firm)

<u>Civil Action No.</u>	<u>Case Style</u>
2:13-cv-05877	Carol Olsen and William Smith v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson

EXHIBIT K
(Waters & Kraus)

Civil Action No.	Case Style
2:13-cv-18148	Kayleen Martin and Kye Martin v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-21913	Evangelina Jimenez and Thomas Jimenez v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-21856	Linda V. Gibson v. Ethicon, Inc.; Johnson & Johnson